

Docket No. 2011-468-C

Petition for Arbitration of Interconnection Agreement between Time Warner Cable Information Services (South Carolina), LLC, doing business as Time Warner Cable and Sandhill Telephone Cooperative, Inc.

JOINT MOTION TO HOLD PROCEEDINGS IN ABEYANCE

1. On July 5, 2011, Sandhill indicated that TWCIS’s request to negotiate an interconnection agreement did not fall within 47 U.S.C. Section 251. See **Exhibit 2** of the TWCIS Petition for Arbitration with Sandhill (“Arbitration Petition”).

2. On July 19, 2011, Sandhill indicated that its position regarding interconnection with TWCIS was the same as the RLECs' (Farmers Telephone Cooperative, Inc.; Fort Mill Telephone Co.; Home Telephone Co., Inc.; and PBT Telecom, Inc.; collectively "RLECs") position in the arbitration proceedings in Docket Nos. 2011-243-C through 2011-246-C. See **Exhibit 4** of the Arbitration Petition.

3. As a result of the Commission's decisions in Docket Nos. 2011-243-C through 2011-246-C, on November 11, 2011, TWCIS filed the TWC Arbitration Appeal. The appeal challenged the Commission's ruling that TWCIS is not entitled to directly interconnect and exchange telecommunications traffic with the RLECs.

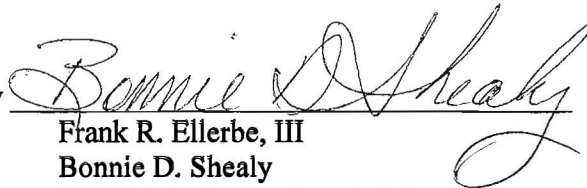
4. On November 15, 2011, TWCIS filed a Petition for 47 U.S.C. Section 252(b) Arbitration with Sandhill. Since the issues in the present docket and the TWC Arbitration Appeal are identical, the outcome in the TWC Arbitration Appeal will be dispositive of this docket. TWCIS and Sandhill believe that administrative and judicial economy will be well served and resources appropriately conserved by holding this proceeding in abeyance pending resolution of the TWC Arbitration Appeal.

5. TWCIS and Sandhill agree to toll the statutory deadline for resolving this arbitration proceeding until the TWC Arbitration Appeal is resolved.

WHEREFORE, for the foregoing reasons, TWCIS and Sandhill respectfully request that the Commission grant this Motion to hold this proceeding in abeyance while the TWC Arbitration Appeal is pending.

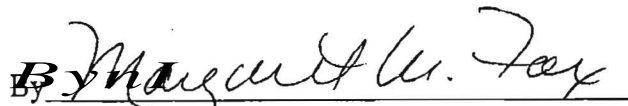
Dated this 1st day of December, 2011.

ROBINSON, MCFADDEN & MOORE, P.C.

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